

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **DATE FILED:** \_\_\_\_\_  
v. : **CRIMINAL NO.** \_\_\_\_\_  
**MELVIN PITTS** : **VIOLATIONS:**  
18 U.S.C. § 1951 (conspiracy to commit robbery which interfered with interstate commerce - 1 count)  
18 U.S.C. § 1951 (interference with interstate commerce by robbery -1 count)  
18 U.S.C. § 924(c)(1) (carrying a firearm during a crime of violence - 1 count)  
18 U.S.C. § 2 (aiding and abetting)  
Notice of forfeiture

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, the Tropicana Lounge located at 1529 North 29th Street, Philadelphia, Pennsylvania, was a business engaged in interstate commerce.

**THE CONSPIRACY**

2. From on or about July 24, 2006, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**MELVIN PITTS**

conspired and agreed together with others unknown to the Grand Jury, to commit robbery, which robbery would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that the defendant MELVIN PITTS and others known to the Grand

Jury, conspired to unlawfully take and obtain currency and property from Tropicana Lounge, in the presence of employees of that business and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their possession, in violation of Title 18, United States Code, Sections 1951(a), 1951(b)(1) and 1951(b)(3).

**MANNER AND MEANS**

3. It was part of the conspiracy to rob Tropicana Lounge, and to obtain the cash proceeds and property from the business, at gunpoint and by threatening to use and using force and violence against the Lounge employees.

**OVERT ACTS**

In furtherance of the conspiracy and to effect the object of the conspiracy, the following overt acts, among others, were committed on or about July 24, 2006, in Philadelphia, in the Eastern District of Pennsylvania:

1. Defendant MELVIN PITTS and others unknown to the Grand Jury, entered Tropicana Lounge together carrying firearms.

2. Defendant MELVIN PITTS and others unknown to the Grand Jury, brandished firearms, menaced the bar owner, and took money.

3. Defendant MELVIN PITTS and others unknown to the Grand Jury, stole at gunpoint an undetermined amount of United States currency from Tropicana Lounge.

\_\_\_\_\_All in violation of Title 18, United States Code, Sections 1951(a), 1951(b)(1) and 1951(b)(3).

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**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1 and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.

2. On or about July 24, 2006, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**MELVIN PITTS**

aided and abetted, and unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant MELVIN PITTS and others unknown to the Grand Jury unlawfully took and obtained personal property, that is, an undetermined amount of United States currency, belonging to the Tropicana Lounge, from employees, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their custody and control.

In violation of Title 18, United States Code, Sections 1951, 1951(b)(1), 1951(b)(3), and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 24, 2006, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**MELVIN PITTS**

knowingly used and carried, and aided and abetted the use and carrying of firearms, during and in relation to a crime of violence for which the defendant may be prosecuted in a Court of the United States, that is, conspiracy to interfere with interstate commerce by robbery and the interference with interstate commerce by robbery, of Shernoff Salads Company, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**NOTICE OF FORFEITURE**

As a result of the violations of Title 18, United States Code, Sections 924(c), set forth in this indictment, defendant

**MELVIN PITTS**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearms and ammunition involved in the commission of these offenses.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

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GRAND JURY FOREPERSON

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PATRICK L. MEEHAN  
United States Attorney